

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION INTO	)	
WHOLESALE WATER RATES CHARGED BY	)	
THE CITY OF CARLISLE TO SHARPSBURG	)	CASE NO.
WATER DISTRICT AND NICHOLAS COUNTY	)	2021-00382
WATER DISTRICT PURSUANT TO KRS 278.200,	)	
KRS 278.160, KRS 278.180, KRS 278.190 AND	)	
807 KAR 5:011	)	

COMMISSION STAFF'S SECOND POST-HEARING REQUEST FOR INFORMATION  
TO THE CITY OF CARLISLE

The city of Carlisle (Carlisle), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on February 28, 2022. The Commission directs Carlisle to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Carlisle shall make timely amendment to any prior response if Carlisle obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Carlisle fails or refuses to furnish all or part of the requested information, Carlisle shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Carlisle shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Provide the total water sales revenue collected from Nicholas County Water District (Nicholas District) for the fiscal years 2020 and 2021, not to include any late payment fees or other additional charges.

- a. Provide all late payments paid by Nicholas District for fiscal years 2020 and 2021.

- b. Provide any additional charges paid by Nicholas District for fiscal years 2020 and 2021.

2. Provide the total water sales revenue collected from Sharpsburg Water District (Sharpsburg District) for the fiscal years 2020 and 2021.

a. Provide all late payments paid by Sharpsburg District for fiscal years 2020 and 2021.

b. Provide any additional charges paid by Sharpsburg District for fiscal years 2020 and 2021.

3. Provide the total gallons sold, separately stated, to Nicholas District, Sharpsburg District, and to all other customers for the fiscal years 2020 and 2021.

4. Provide Carlisle's water loss percentage<sup>2</sup> for the fiscal years 2020 and 2021.

5. Provide Carlisle's depreciation schedule for the fiscal year ended June 30, 2020.

6. Refer to Carlisle's response to Commission Staff's First Request for Information, Item 1, Exhibits 10-A-1, 10-A-2, 10-A-3, 10-A-4, and 10-B. Also refer to Nicholas District's response to Commission Staff's Post-Hearing Request for Information, Item 4 and Sharpsburg District's response to Commission Staff's Post-Hearing Request for Information, Item 1, Exhibit A.

a. Explain whether Carlisle has been billing Nicholas District rates other than those that are currently on file with the Commission on the tariff page stamped March 18, 2019, since July 2020.

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<sup>2</sup> Water Produced and Purchased – Water Sales – System Usage = Water Loss / Water Produced and Purchased = Water Loss Percentage.

b. If so, reconcile that with Nicholas District's response that it has been billed rates based on the tariff page stamped March 18, 2019, since July 2020.

c. If not, explain why the billing records provided by Carlisle indicate otherwise.

d. Provide updated Exhibits 10-A-1, 10-A-2, 10-A-3, 10-A-4, and 10-B for the same time periods that include all billing detail, including all adjustments applied to Nicholas District and Sharpsburg District's accounts and all payments made by Nicholas District and Sharpsburg District.

e. If Carlisle has been correctly billing Nicholas District the rates on file with the Commission since July 2020, explain why Carlisle has not been billing Sharpsburg District at the same rates.

7. Provide the reason Carlisle is not pumping water to Sharpsburg District.

a. If the cause is short term, provide a timeline and explanation of when Carlisle anticipates pumping water to Sharpsburg District.

b. If the cause is long term, provide a timeline and explanation of when Carlisle anticipates pumping water to Sharpsburg District.

c. Provide all contact you have had with Sharpsburg District since this issue began, provide all copies of emails, phone contacts or letters used to inform Sharpsburg District of the cause of the failure to continue pumping water to Sharpsburg District.

*Linda C. Bridwell*

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DATED JAN 31 2022

cc: Parties of Record

Case No. 2021-00382

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